

FDA
Dockets Management Branch (HFA-305)
5630 Fishers Lane, rm.1061
Rockville, MD 20852

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In reply to Guidance for Industry: Reducing Microbial Food Safety Hazards for Sprouted Seeds.

I am concerned about the contamination issue of raw and fresh produce. Sprout growers are downstream of the obvious source of contamination. Please address the problem more directly. The guidelines place an unfair burden on sprout growers. The article below is a serious indication of a problem out of control. Further research is not necessary, action is required. The Food Safety Issue is a waste management issue lacking management.

Sincerely,

Scott Shulman
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This policy is
absurd and the voters
will learn this and
see this corporate
preference as unjust

Researchers say many livestock feedlots are contaminated with E. coli

CLAY CENTER, Neb. (AP) — A deadly strain of E. coli bacteria is more prominent in U.S. feedlots than previously believed, said scientists at the U.S. Meat Animal Research Center.

"It may be that every feedlot is colonized with the O157:H7 strain," said Jim Keen, a veterinary epidemiologist at the center. "We've looked only at beef cattle, but we've looked at about 15,000 to 16,000 in about 15 different states. We've never found a negative feedlot."

It had been widely assumed that perhaps 1 or 2 percent of cattle carry the E. coli strain — which does not affect cattle, but can be fatal to people.

Research done by Keen and partner Rob Elder, a veterinary microbiologist, suggests the numbers may be as high as 50 to 70 percent of all animals approaching slaughter weight in late summer.

Bacteria flourish in higher temperatures, which undoubtedly

is a factor in higher readings, Keen said. Winter testing of cattle has turned up about 1 percent of positive E. coli results.

A key to researchers' success in tracking E. coli was their development and selection of sensitive antibodies that react to the bacteria.

That eliminated previous testing problems with false readings.

Keen and Elder are preparing to publish the results of more than five years of research in professional journals. Their work included the examination of 16,000 manure samples from 60 herds. Many of the herds were in the beef states of Texas, Kansas and Nebraska, but animals from states as far away as North Carolina also were included.

The researchers' project took shape in the wake of the 1993 E. coli contamination of frozen hamburger patties that led to several deaths and hundreds of illnesses in Western states.

The same problem led to the

largest recall of red meat in U.S. history at the former Hudson Foods plant in Columbus in 1997. In the months that followed, the former BeefAmerica plant in Norfolk also was the focus of two beef recalls because of E. coli.

The Nebraska Cattlemen has been closely monitoring the Clay Center facility's research.

The most common causes of contamination during meat processing are E. coli being transferred during removal of a manure-coated hide or internal organs from the carcass, cattlemen spokesman Greg Ruehle said.

Thoroughly cooking meat is the best protection against contamination problems.

Keen said more accurate ways of testing for E. coli and more knowledge about its prevalence may help control it in cattle.

Changing diets and adjusting use of antibiotics are areas scientists will explore to control E. coli presence in feedlots, he said.

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